

### **REMARKS**

This communication is a full and timely response to the final Office Action dated December 29, 2004 (Paper No./Mail Date 20041201). By this communication, claims 1 and 7 have been amended.

Claims 1 and 7 have been amended to improve form and idiomatic English. No new matter has been added.

Entry of this Amendment is proper under 37 C.F.R. §1.116 since the amendment: (a) places the application in condition for allowance (for the reasons discussed herein); (b) does not raise any new issues requiring further search and/or consideration; (c) satisfies a requirement of form asserted in the previous Office Action; and (d) places the application in better form for appeal, should an appeal be necessary. The amendment is necessary and was not earlier presented because it is made in response to arguments raised in the final rejection. Entry of this amendment is respectfully requested. Reexamination and reconsideration in light of the above amendments and the following remarks is respectfully requested. Claims 1-6, 8-10, and 13 are pending where claims 1 and 12 are independent. Entry of this Amendment is proper under 37 C.F.R. §1.116 since the amendment: (a) places the application in condition for allowance (for the reasons discussed herein); (b) does not raise any new issues requiring further search and/or consideration; (c) satisfies a requirement of form asserted in the previous Office Action; and (d) places the application in better form for appeal, should an appeal be necessary. The amendment is necessary and was not earlier presented because it is made in response to arguments raised in the final rejection. Entry of this amendment is respectfully requested. Reexamination and reconsideration in light of the above amendments and the following remarks is respectfully requested.

Claims 1, 3, 4, and 6-8 are pending where claims 1, 4, and 7 are independent.

### **Claim Objections**

Claims 1 and 7 were objected to for informalities. Applicant has amended claims 1 and 7 in a manner that addresses the objection. Accordingly, Applicant respectfully requests that the objection to claims 1 and 7 be withdrawn.

**Rejections Under 35 U.S.C. §102**

Claims 1-8 were rejected under 35 U.S.C. §102(e) as anticipated by *Struyk*, U.S. Patent Application Publication No. 2003/0118183. Applicant respectfully traverses this rejection.

Applicant notes that in the Amendment in Response to Non-Final Office Action filed on October 8, 2004, claims 2 and 5 were canceled without prejudice. Accordingly, Applicant respectfully requests that the rejection to claims 2 and 5 be withdrawn.

Claim 1 recites an image display apparatus, comprising first image light generation means for generating image lights individually corresponding to a plurality of color components, which form a single first color component group; and display image light generation means for synthesizing the image lights of the individual color components generated by said first image light generation means to generate a first display image light; said first image light generation means setting color component values of the individual color components of the first color component group, so that the first display image light may be generated with a chromaticity point and a luminance equal to those of a second display image light, wherein the second display image light includes synthesized image lights individually corresponding to color components of a second color component group whose color components in combination are different from those of the first color component group, and wherein said first image light generation means generates image lights individually corresponding to the color components, of the first color component group based on the set color component values; second image light generation means for generating image lights individually corresponding to the color components, which form said second color component group; said display image light generation means synthesizing the image lights of the individual color components generated by said second image light generation means to generate the single second display image light; and switching means for switching the image lights to be synthesized by said display image light generation means between the image lights generated by said first image light generation means and the image lights generated by said second image light generation means based on data provided through a predetermined image pattern input to said switching means.

Claim 4 recites an image display method, comprising a first image light generation step of generating image lights individually corresponding to a plurality of color components, which form a first color component group; and a display image light generation step of synthesizing the image lights of the individual color components generated by the first image light generation

step to generate a single first display image light; the first image light generation step setting color component values of the individual color components, which form the first color component group, so that the first display image light may be generated with a chromaticity point and a luminance equal to those of a second display image light to be generated by synthesizing image lights individually corresponding to color components of a second color component group whose color components in combination are different from those of the first color component group, the first image light generation step generating image lights individually corresponding to the color components, which form the first color component group based on the set color component values; a second image light generation step generating image lights individually corresponding to the color components, which form the second color component group; the display image light generation step synthesizing the image lights of the individual color components generated by the second image light generation step to generate the single second display image light; and a switching step of switching the image lights to be synthesized by the display image light generation step between the image lights generated by the first image light generation step and the image lights generated by the second image light generation step based on data provided through a predetermined image pattern input to said switching means.

Claim 7 recites an image display apparatus, comprising first image light generator that generates image lights individually corresponding to a plurality of color components, which form a single first color component group; and display image light generator that synthesizes the image lights of the individual color components generated by said first image light generator to generate a first display image light; said first image light generator setting color component values of the individual color components, which form the first color component group, so that the first display image light may be generated with a chromaticity point and a luminance equal to those of a second display image light to be generated by synthesizing image lights individually corresponding to color components of a second color component group whose color components in combination are different from those of the first color component group, said first image light generator generating image lights individually corresponding to the color components, which form the first color component group based on the set color component values; a second image light generator that generates image lights individually corresponding to a plurality of color components, which form said second color component group; the display image light generator synthesizes said image lights of the individual color components generated by the second image light generator to generate the single second display image light; and a switch that switches the

image lights to be synthesized by the display image light generator between the image lights generated by the first image light generator and the image lights generated by the second image light generator based on data provided through a predetermined image pattern input to said switch.

In summary, claims 1, 4, and 7 recite an image display apparatus and method having first and second light generators. The first light generator generates synthesized light of a first color group and the second light generator generates synthesized light of a second color group, where the first and second color groups are not the same. A predetermined image pattern is input to a switch. The switch then displays light generated by either the first or second light generator based on the input image pattern.

*Struyk* discloses an image altering apparatus having an image signal generator 1 that generates a fundamental image signal. A video display 3 displays the fundamental image signal generated by the image signal generator 1. The fundamental image signal includes red, green, and blue color data components that are output from the image signal generator 1 on lines 5, 7, and 9, respectively. Before being displayed on the video display 3 the signals 5, 7, and 9 output by the image signal generator 1 are input to a signal modifying means 11. The hardware modifying means 11 includes an A/D converter (27, 45, and 53), a digital signal processor (31, 47, 55), a D/A converter (35, 49, 57), and a buffer (43, 51, 59) on each of the respective signal lines 5, 7, and 9. the A/D converter samples and converts the corresponding fundamental color to a digital representation. The digital color value is input to the digital signal processor either passes or inverts the digital color value based on a signal received from a sync control mechanism 13. The D/A converter receives either the fundamental or inverted color signal from the digital signal processor and converts the digital color value into an analog color signal and outputs the analog color signal to a corresponding buffer. The buffer holds the associated color signal and outputs the signal to the video display 3 where the color signals are multiplexed and displayed. *Struyk*, however, fails to disclose, teach, or suggest at least second light generation means or a second light generation step as recited in claims 1, 4, and 7, where applicable.

The Office Action alleges that the image signal generator 1 functions as both the claimed first light generation means and second light generation means. However, Applicant respectfully submits that the image signal generator of *Struyk* functions only as a first generation means, and fails to disclose, teach, or suggest that the generation of a second set of lights is possible or desirable. As discussed above, the digital signal processors (31, 47, 55) that correspond to each

fundamental color signal (5, 7, 9) invert the fundamental color signal based on a signal received from the sync control mechanism 13. Thus, the image signal generator does not generate first and second sets of image lights, but does generate a single set of image lights that are inverted by the digital signal processor. The digital signal processor is not analogous to a second light generation means because the digital signal processor merely processes a set of generated image lights. Thus, *Struyk* fails to anticipate claims 1, 4, and 7.

To properly anticipate a claim, the document must disclose, explicitly or implicitly, each and every feature recited in the claim. See Verdegall Bros. v. Union Oil Co. of Calif., 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). *Struyk* fails to disclose, teach, or suggest every element recited in independent claims 1, 4, and 7, therefore these claims are not anticipated by *Struyk*. Accordingly, Applicant respectfully requests that the rejection of claims 1, 4, and 7 under 35 U.S.C. §102 be withdrawn, and these claims be allowed.

Claim 3 depends from claim 1, claim 6 depends from claim 4, and claim 8 depends from claim 7. By virtue of this dependency, Applicant submits that claims 3, 6, and 8 are allowable for at least the same reasons given above with respect to claims 1, 4, and 7, respectively. In addition, Applicant submits that claims 3, 6, and 8 are further distinguished over *Struyk* by the additional elements recited therein, and particularly with respect to each claimed combination. Applicant respectfully requests, therefore, that the rejection of claims 3, 6, and 8 under 35 U.S.C. §102 be withdrawn, and these claims be allowed.

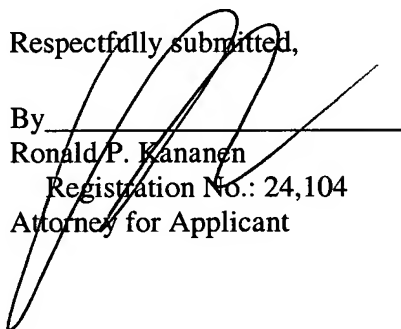
**Conclusion**

Based on at least the foregoing amendments and remarks, Applicants submit that claims 1, 3, 4, and 6-8 are allowable, and this application is in condition for allowance. Accordingly, Applicants request favorable reexamination and reconsideration of the application. In the event the Examiner has any comments or suggestions for placing the application in even better form, Applicants request that the Examiner contact the undersigned attorney at the number listed below.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 18-0013, under Order No. SON-2828 from which the undersigned is authorized to draw.

Dated: February 8, 2005

Respectfully submitted,

By   
Ronald P. Kananen  
Registration No.: 24,104  
Attorney for Applicant

**RADER, FISHMAN & GRAUER, PLLC**  
Lion Building  
1233 20<sup>th</sup> Street, N.W., Suite 501  
Washington, D.C. 20036  
Tel: (202) 955-3750  
Fax: (202) 955-3751  
Customer No. 23353

DC180149